

**EXHIBIT 13**

**REDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GREGORY KINTZ

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 26, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2592507

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1 Q Now, the use of a [REDACTED] [REDACTED]  
[REDACTED] that's known in the 17:22  
3 public; right? 17:22  
4 MR. JAFFE: Objection; form. 17:22  
5 THE WITNESS: There are many applications of 17:22  
6 [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] 17:22  
10 MR. KIM: Q. And it's also known that you 17:22  
11 could use [REDACTED] [REDACTED]  
[REDACTED]; 17:22  
13 correct? 17:22  
14 MR. JAFFE: Objection; form. 17:22  
15 THE WITNESS: Yes. There are certainly 17:22  
16 references in the public domain that discuss the 17:22  
17 [REDACTED] [REDACTED]  
[REDACTED] 17:23  
19 MR. KIM: Q. For a LiDAR application; 17:23  
20 correct? 17:23  
21 A For a LiDAR application. 17:23  
22 Q Okay. So the use of [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] that's not a Trade 17:23  
25 Secret; right? 17:23

1 A No. The -- [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:23  
5 Q Where are the [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:24  
7 A I just misspoke and -- and mischaracterized 17:24  
8 the Trade Secret. The Trade Secret really in this 17:24  
9 case, Trade Secret 48, just talks about [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:24  
11 THE VIDEOGRAPHER: 1053. 17:24  
12 (Document marked Exhibit 1053 17:24  
13 for identification.) 17:24  
14 MR. KIM: So I've marked as Exhibit No. 1053, 17:24  
15 which is a printout from a website. 17:24  
16 Q You had mentioned that there are a lot of 17:24  
17 vendors out there that sell [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] including for LiDAR 17:24  
19 applications. 17:24  
20 Is this one example of that? 17:24  
21 A Yes. 17:24  
22 Q Okay. And you'll note that in the paragraph, 17:24  
23 it says: 17:25  
24 [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] 17:25

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [ ] was [x] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

Dated: 4/27/2017



ANDREA M. IGNACIO,

RPR, CRR, CCRR, CLR, CSR No. 9830